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Giving Home Health Care, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

AMANDA WHITEAR;) Case No. 2:24-cv-01009-DJA
)
Plaintiff,) DISCOVERY PLAN
) AND SCHEDULING
v.) ORDER SUBMITTED
) IN COMPLIANCE WITH
GIVING HOME HEALTH CARE, LLC;) LR 26-1(b)
DOES 1 through X, inclusive; and, ROE)
CORPORATIONS 1 through X; inclusive,)
)
Defendants.)
_____)

Pursuant to Federal Rules of Civil Procedure 26(f) and Local Rule 26-1, the parties through their respective counsel, submit the following proposed Discovery Plan and Scheduling Order.

(1) **Discovery Cutoff Date.** The discovery period will close on April 29, 2025, which is 180 days from the date of the filing of Defendant's Answer.

(2) **Amending the Pleadings and Adding Parties.** The date for filing motions to amend the pleadings or to add parties shall be on or before January 29, 2025, which is not later than 90 days prior to the close of discovery.

(3) **Expert Witness Disclosures.** The disclosure of any expert witnesses shall be made on or before February 28, 2025, which is not less than 60 days before the

1 discovery deadline. The disclosures of any rebuttal experts shall be due on or before
2 March 30, 2025. The requirements of F.R.C.P. 26(a)(2)(B) shall apply to any such
3 disclosures.

4 (4) **Dispositive Motions.** Dispositive motions shall be filed by May 29,
5 2025, which is 30 days after the discovery cut-off date.

6 (5) **Pretrial Order.** The Joint Pretrial Order shall be filed by June 28, 2025,
7 which is the first court day 30 days after the dispositive motions deadline. However, if
8 dispositive motions are filed, the date for filing the Joint Pretrial Order shall be
9 suspended until 30 days after a decision on the dispositive motions or further order of
10 the Court. The disclosures required by Federal Rules of Civil Procedure 26(a)(3), and
11 any objections thereto, shall be included in the Joint Pretrial Order.

12 (6) **Initial Disclosures.** The parties will make their Initial Disclosures by
13 December 13, 2025, with no changes in the form or requirements for such disclosures.

14 (7) **Discovery Subjects.** The parties may conduct discovery within the
15 scope of Federal Rules of Civil Procedure 26(b). Subject to the foregoing, discovery
16 need not be limited or focused on particular issues or conducted in phases.

17 (8) **Electronically Stored Information (“ESI”).** The parties recognize that
18 electronically-stored information may be involved in this matter and prefer to deal with
19 such information on an ad hoc basis as issues may arise. The parties have discussed
20 whether they intend to present evidence in electronic format to jurors for the purpose of
21 jury deliberations, but no stipulations have been reached at this time regarding
22 providing discovery in an electronic format compatible with the Court’s electronic jury
23 evidence display system.

(9) **Protection of Privileged/Trial Preparation Material.** The parties prefer to handle these issues on an ad hoc basis as issues arise, but the provisions of Fed. R. Civ. P. 26(b)(5)(B) and Federal Rules of Evidence 502 shall apply.

(10) The parties certify they have conferred about the possibility of using alternative dispute resolution processes, including mediation, arbitration and early neutral evaluation, and have considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73 and use of the Short Trial Program (General Order 2013-01).

HOLMAN LAW OFFICE

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IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

Dated: 12/6/2024

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